

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

JORDAN WINCZUK,

Defendant

) Criminal No. **19CR40011-TSH**

) Violations:

) Count One: Attempted Sexual Exploitation of a
Minor

) (18 U.S.C. §§ 2251(a) and (e))

) Count Two: Commission of a Felony Offense
Involving a Minor When Required to Register as
a Sex Offender

) (18 U.S.C. § 2260A)

) Forfeiture Allegation:

) (18 U.S.C. § 2253)

INDICTMENT

COUNT ONE

Attempted Sexual Exploitation of a Minor
(18 U.S.C. §§ 2251(a) and (e))

The Grand Jury charges:

From on or about January 16, 2018 through on or about February 12, 2018, in Worcester,
in the District of Massachusetts, and elsewhere, the defendant,

JORDAN WINCZUK,

did attempt to employ, use, persuade, induce, entice, and coerce “Minor #1,” a person under the
age of 18 years, to engage in sexually explicit conduct for the purpose of producing any visual
depiction of such conduct, knowing and having reason to know that such visual depiction would
be transported and transmitted using any means and facility of interstate and foreign commerce
and in and affecting interstate and foreign commerce and mailed.

All in violation of Title 18, United States Code, Sections 2251(a) and (e) and Section 3559(e).

COUNT TWO

Commission of a Felony Offense Involving a Minor
When Required to Register as a Sex Offender
(18 U.S.C. § 2260A)

The Grand Jury further charges:

From on or about January 16, 2018 through on or about February 12, 2018, in Worcester, in the District of Massachusetts, and elsewhere, the defendant,

JORDAN WINCZUK,

being required by Federal and other law, namely, under the laws of the State of New Jersey, to register as a sex offender, did commit a felony offense involving a minor under Title 18, United States Code, Section 2251, to wit, the felony offense alleged in Count One of this Indictment.

All in violation of Title 18, United States Code, Section 2260A.

CHILD EXPLOITATION FORFEITURE ALLEGATION
(18 U.S.C. § 2253)

The Grand Jury further finds that:

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 2251, set forth in Count One of this Indictment, the defendant,

JORDAN WINCZUK,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 2253, (i) any visual depiction described in sections 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Chapter 110 of Title 18; (ii) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense(s); and (iii) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense(s) or any property traceable to such property. The property to be forfeited includes, but is not limited to, the following:

- a. Black Kyocera DEC: 256691560106461233
- b. Black LG Smartphone with camo case and charger
- c. Samsung Cellphone
- d. Black ZTE Smartphone and SIM card
- e. Motorola Cell Phone
- f. Boost Mobile Cards

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 2253, as a result of any act or omission of the defendant --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States of America, pursuant to Title 18, United States Code, Section 2253(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL


FOREPERSON


KRISTEN M. NOTO
ASSISTANT U.S. ATTORNEY

District of Massachusetts: April 4, 2019
Returned into the District Court by the Grand Jurors and filed.


DEPUTY CLERK